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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR 07-0414 SI
	)	
Plaintiff,	)	[PROPOSED] ORDER AND
	)	STIPULATION CONTINUING SETTING
v.	)	DATE FROM NOVEMBER 2, 2007 TO
	)	NOVEMBER 16, 2007 AND EXCLUDING
NINA L. DONEHUE,	)	TIME FROM THE SPEEDY TRIAL ACT
	)	CALCULATION (18 U.S.C.
Defendant.	)	§ 3161(h)(8)(A) & (B)(iv))

The undersigned parties stipulate as follows:

1. The parties' next appearance before this Court is scheduled on November 2, 2007 at 11:00 a.m.
2. At the last court appearance, the Court continued the next date until November 2, 2007 under a schedule by which the defense would have approximately three weeks to evaluate discovery that the government was going to gather and produce regarding a possible jurisdictional challenge to the indictment. Due to the records being dispersed and more voluminous than the parties anticipated, the defense did not receive the discovery until October 30, 2007, just three days before the next court date. Further, the documents comprise 830 pages of new material the includes detailed and somewhat complex agreements.
3. In light of the newly produced discovery and the defendant's previous request, the defense

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requests additional time to review the 830 pages of discovery and to research whether the defense can raise a jurisdictional challenge in light of the new information.

4. In light of the above, the government does not object to the defendant's request for additional time.

5. The parties request that the matter be continued to November 16, 2007 at 11:00 a.m. for motion or trial setting, or change of plea. The parties agree to an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A) & (B)(iv), from November 2, 2007 to November 16, 2007. The parties concur that failure to grant the requested continuance would unreasonably deny both government and defense counsel reasonable time necessary for effective case preparation.

IT IS SO STIPULATED.

DATED: \_\_\_\_\_

/s/  
ERIKA R. FRICK  
Assistant United States Attorney

DATED: \_\_\_\_\_

/s/  
SHAWN HALBERT  
Attorney for Defendant

### **[PROPOSED] ORDER**

With the agreement of the parties, and with the consent of the defendant, the Court enters this order (1) continuing the next appearance before this Court from, November 2, 2007 to November 16, 2007 at 11:00 a.m.; and (2) excluding time from November 2, 2007 to November 16, 2007, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A) & (B)(iv).

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HON. SUSAN ILLSTON  
United States District Judge